	ase 2:10-cv-04518-DDP-SS Document 1	Filed 06/18/10 Page 1 of 12 Page 18 #1
	: :	
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6	A Connecticut Law Firm	ALIF.
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8	Stamford, CT 06905 Telephone: (203) 653-2250	
9	Facsimile: (203) 653-3424	
10	Attorneys for Plaintiff,	
11	Jill Rogers	
12		
13	I MITED STATES	DISTRICT COURT
14		
	CENTRAL DISTRIC	CT OF CALIFORNIA
15		CT OF CALIFORNIA I DIVISION
16		DIVISION
16 17	WESTERN	DIVISION
16	WESTERN Jill Rogers,	CaseNO.: 0 4518 DDP SSX
16 17	WESTERN	Case NO.: DDP SSX Case NO.: DDP SSX COMPLAINT FOR DAMAGES 1. VIOLATION OF FAIR DEBT
16 17 18 19 20	WESTERN Jill Rogers,	CaseNO.: COMPLAINT FOR DAMAGES 1. VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT,
16 17 18 19 20 21	WESTERN Jill Rogers, Plaintiff, vs.	COMPLAINT FOR DAMAGES 1. VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 ET. SEQ; 2. VIOLATION OF FAIR DEBT
16 17 18 19 20 21 22	WESTERN Jill Rogers, Plaintiff, vs. USCB, Inc.; and DOES 1-10, inclusive,	COMPLAINT FOR DAMAGES 1. VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 ET. SEQ; 2. VIOLATION OF FAIR DEBT COLLECTION PRATICES ACT,
 16 17 18 19 20 21 22 23 	WESTERN Jill Rogers, Plaintiff, vs.	DIVISION CALCEVENCE DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY SSY DDP SSY SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY
 16 17 18 19 20 21 22 23 24 	WESTERN Jill Rogers, Plaintiff, vs. USCB, Inc.; and DOES 1-10, inclusive, Defendants.	COMPLAINT FOR DAMAGES 1. VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 ET. SEQ; 2. VIOLATION OF FAIR DEBT COLLECTION PRATICES ACT,
 16 17 18 19 20 21 22 23 	WESTERN Jill Rogers, Plaintiff, vs. USCB, Inc.; and DOES 1-10, inclusive, Defendants.	DIVISION CALCEVENCE DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY SSY DDP SSY SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY
 16 17 18 19 20 21 22 23 24 25 	WESTERN Jill Rogers, Plaintiff, vs. USCB, Inc.; and DOES 1-10, inclusive, Defendants.	DIVISION CALCEVENCE DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY
 16 17 18 19 20 21 22 23 24 25 26 	WESTERN Jill Rogers, Plaintiff, vs. USCB, Inc.; and DOES 1-10, inclusive, Defendants.	DIVISION CASEND: COMPLAINT FOR DAMAGES 1. VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 ET. SEQ; 2. VIOLATION OF FAIR DEBT COLLECTION PRATICES ACT, CAL.CIV.CODE § 1788 ET. SEQ. JURY TRIAL DEMANDED
 16 17 18 19 20 21 22 23 24 25 26 27 	WESTERN Jill Rogers, Plaintiff, vs. USCB, Inc.; and DOES 1-10, inclusive, Defendants.	DIVISION CALCEVENCE DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY SSY DDP SSY DDP SSY

1 For this Complaint, the Plaintiff, Jill Rogers, by undersigned counsel, states as 2 follows: 3 4 JURISDICTION 5 This action arises out of Defendants' repeated violations of the Fair Debt 1. 6 Collection Practices Act, 15 U.S.C. § 1692, et seq. ("FDCPA"), and the invasions of 7 8 Plaintiff's personal privacy by the Defendants and its agents in their illegal efforts to 9 collect a consumer debt. 10 2. Supplemental jurisdiction exists pursuant to 28 U.S.C. § 1367. 11 12 Venue is proper in this District pursuant to 28 U.S.C. § 1391(b), in that 3. 13 Defendants transact business here and a substantial portion of the acts giving rise to 14 this action occurred here. 15 16 PARTIES 17 The Plaintiff, Jill Rogers (hereafter "Plaintiff"), is an adult individual 4. 18 19 residing in Sacramento, California, and is a "consumer" as the term is defined by 20 15 U.S.C. § 1692a(3). 21 5. The Defendant, USCB, Inc. (hereafter "USBC"), is a California company 22 23 with an address of 3333 Wilshire Boulevard, Seventh Floor, Los Angeles, California 24 90010, operating as a collection agency, and is a "debt collector" as the term is 25 defined by 15 U.S.C. § 1692a(6). 26 27 28 2 COMPLAINT FOR DAMAGES

1	6. Does 1-10 (the "Collectors") are individual collectors employed by		
2 3	USCB and whose identities are currently unknown to the Plaintiff. One or more of		
3 4	the Collectors may be joined as parties once their identities are disclosed through		
5	discovery.		
6 7	7. USCB at all times acted by and through one or more of the Collectors.		
8	ALLEGATIONS APPLICABLE TO ALL COUNTS		
9 10	A. <u>The Debt</u>		
11 12	8. The Plaintiff incurred a financial obligation in the approximate amount of		
12	\$2,000.00 (the "Debt") to a hospital (the "Creditor").		
14	9. The Debt arose from services provided by the Creditor which were		
15	primarily for family, personal or household purposes and which meets the definition		
16 17	of a "debt" under 15 U.S.C. § 1692a(5).		
18	10. The Debt was purchased, assigned or transferred to USCB for collection,		
19	or USCB was employed by the Creditor to collect the Debt.		
20 21	11. The Defendants attempted to collect the Debt and, as such, engaged in		
22	"communications" as defined in 15 U.S.C. § 1692a(2).		
23 24	B. <u>USCB Engages in Harassment and Abusive Tactics</u>		
25 26	12. USCB called the Plaintiff numerous times per week in attempts to collect		
27	the Debt.		
28			
	3 COMPLAINT FOR DAMAGES		

13.	On numerous occasions, USCB disconnects the call as soon as the	
Plaintiff and	swers.	
14.	USCB is rude and abusive when speaking to the Plaintiff.	
14.	USCH is fude and abusive when speaking to the flammin.	
15.	USCB is adding interest and fees in violation of the Debt agreement.	
C. Plain	ntiff Suffered Actual Damages	
<u> </u>	tim Builereu Retuur Buillages	
16.	The Plaintiff has suffered and continues to suffer actual damages as a	
result of the	e Defendants' unlawful conduct.	
17.	As a direct consequence of the Defendants' acts, practices and conduct,	
the Plaintiff	f suffered and continues to suffer from humiliation, anger, anxiety,	
	listress, fear, frustration and embarrassment.	
18.	The Defendants' conduct was so outrageous in character, and so extreme	
in degree, a	s to go beyond all possible bounds of decency, and to be regarded as	
atrocious, and utterly intolerable in a civilized community.		
VIO	<u>COUNT I</u> DLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT <u>15 U.S.C. § 1692, et seq.</u>	
19.	The Plaintiff incorporates by reference all of the above paragraphs of this	
Complaint a	as though fully stated herein.	
20.	The Defendants used profane and abusive language when speaking with	
the consum	er, in violation of 15 U.S.C. § 1692d(2).	
	4 COMPLAINT FOR DAMAGES	

1	21.	The Defendants caused a phone to ring repeatedly and engaged the	
2	Plaintiff in	telephone conversations, with the intent to annoy and harass, in violation	
3			
4	of 15 U.S.C. § 1692d(5).		
5	22.	The Defendants misrepresented the character, amount and legal status of	
6 7	the debt, in	violation of 15 U.S.C. § 1692e(2).	
/ 8	23.	The Defendants employed false and deceptive means to collect a debt, in	
9	violation of		
10	VIOIATION OI	E 15 U.S.C. § 1692e(10).	
11	24.	The foregoing acts and omissions of the Defendants constitute numerous	
12	and multipl	e violations of the FDCPA, including every one of the above-cited	
13	provisions.		
14	25.	The Plaintiff is entitled to damages as a result of the Defendants'	
15		The Flainth is childed to damages as a result of the Derendants	
16	violations.		
17		COUNT II	
18	VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION		
	<u> </u>	VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION	
19	_	<u>VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION</u> PRACTICES ACT, Cal. Civ. Code § 1788 et seq.	
19 20	Y 26.	VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION	
19 20 21	26.	<u>VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION</u> PRACTICES ACT, Cal. Civ. Code § 1788 et seq.	
19 20	26.	VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT, Cal. Civ. Code § 1788 et seq. The Plaintiff incorporates by reference all of the above paragraphs of this	
19 20 21 22	26. Complaint a 27.	VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT, Cal. Civ. Code § 1788 et seq. The Plaintiff incorporates by reference all of the above paragraphs of this as though fully stated herein. The Rosenthal Fair Debt Collection Practices Act, California Civil Code	
19 20 21 22 23	26. Complaint a 27. section 178	 VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT, Cal. Civ. Code § 1788 et seq. The Plaintiff incorporates by reference all of the above paragraphs of this as though fully stated herein. The Rosenthal Fair Debt Collection Practices Act, California Civil Code 8 et seq. ("Rosenthal Act") prohibits unfair and deceptive acts and 	
 19 20 21 22 23 24 	26. Complaint a 27. section 178	VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT, Cal. Civ. Code § 1788 et seq. The Plaintiff incorporates by reference all of the above paragraphs of this as though fully stated herein. The Rosenthal Fair Debt Collection Practices Act, California Civil Code	
 19 20 21 22 23 24 25 	26. Complaint a 27. section 178	 VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT, Cal. Civ. Code § 1788 et seq. The Plaintiff incorporates by reference all of the above paragraphs of this as though fully stated herein. The Rosenthal Fair Debt Collection Practices Act, California Civil Code 8 et seq. ("Rosenthal Act") prohibits unfair and deceptive acts and 	
 19 20 21 22 23 24 25 26 	26. Complaint a 27. section 178	 IOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT, Cal. Civ. Code § 1788 et seq. The Plaintiff incorporates by reference all of the above paragraphs of this as though fully stated herein. The Rosenthal Fair Debt Collection Practices Act, California Civil Code 8 et seq. ("Rosenthal Act") prohibits unfair and deceptive acts and the collection of consumer debts. 	
 19 20 21 22 23 24 25 26 27 	26. Complaint a 27. section 178	 VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION PRACTICES ACT, Cal. Civ. Code § 1788 et seq. The Plaintiff incorporates by reference all of the above paragraphs of this as though fully stated herein. The Rosenthal Fair Debt Collection Practices Act, California Civil Code 8 et seq. ("Rosenthal Act") prohibits unfair and deceptive acts and 	

1	28.	USCB, in the regular course of business, engages in debt collection and is	
2	a ''debt coll	ector" as defined by Cal. Civ. Code § 1788.2(c).	
3			
4	29.	The Defendants used obscene and profane language when speaking with	
5	the Plaintif	f, in violation of Cal. Civ. Code § 1788.11(a).	
6 7	30.	The Defendants caused a telephone to ring repeatedly and engaged the	
8	Plaintiff in	continuous conversations with an intent to annoy the Plaintiff, in violation	
9	of Cal. Civ.	Code § 1788.11(d).	
10			
11	31.	The Defendants communicated with the Plaintiff with such frequency as	
12	to be consid	lered harassment, in violation of Cal. Civ. Code § 1788.11(e).	
13	32.	The Defendants failed to comply with the provisions of 15 U.S.C. §	
14 15	1692, et sec	I., in violation of Cal. Civ. Code § 1788.13(e).	
15 16	33.	The Defendants falsely represented that the Plaintiff's debt would be	
17	increased b	y the addition of attorney's fees, investigation fees, service fees, finance	
18 19	charges or other charges, when the charges could not be legally added to the debt, in		
20	violation of Cal. Civ. Code § 1788.13(e).		
21	34.	The Defendants did not comply with the provisions of Title 15, Section	
22	1692 of the	United States Code, in violation of Cal. Civ. Code § 1788.17.	
23			
24	35.	The Plaintiff is entitled to damages as a result of the Defendants'	
25 26	violations.		
26 27			
27 28			
_0		6 COMPLAINT FOR DAMAGES	

Ca	se 2:10-cv-04518-DDP-SS Document 1 Filed 06/18/10 Page 7 of 12 Page ID #:7	
1 2 3 4 5 6 7	PRAYER FOR RELIEF WHEREFORE, the Plaintiff prays that judgment be entered against the Defendants: A. Actual damages pursuant to 15 U.S.C. § 1692k(a)(1) against the Defendants;	
8 9	 B. Statutory damages of \$1,000.00 pursuant to 15 U.S.C. \$1692k(a)(2)(A) against the Defendants; 	
10		
11	C. Costs of litigation and reasonable attorney's fees pursuant to 15 U.S.C.	
12 13	§ 1692k(a)(3) against the Defendants;	
13 14	D. Actual damages pursuant to Cal. Civ. Code § 1788.30(a);	
15	E. Statutory damages of \$1,000.00 per violation for knowingly and	
16	willfully committing violations pursuant to Cal. Civ. Code	
17	§ 1788.30(b);	
18 19	F. Statutory damages pursuant to 47 U.S.C. § 227(b)(3)(B) & (C);	
20		
21	G. Actual damages from the Defendants for the all damages including	
22	emotional distress suffered as a result of the intentional, reckless, and/or	
23	negligent FDCPA violations and intentional, reckless, and/or negligent	
24 25	invasions of privacy in an amount to be determined at trial for the	
25 26	Plaintiff;	
20	H. Punitive damages; and	
28		
	7 COMPLAINT FOR DAMAGES	

Cas	se 2:10-cv-04518-DDP-SS Document 1 F	Filed 06/18/10 Page 8 of 12 Page ID #:8
1 2 3		elief as may be just and proper.
4		
5		
6 7	DATED: June 18, 2010	LARA SHAPIRO
8		
9 10		By: <u>/s/ Lara R. Shapiro</u> Lara R. Shapiro
11		Lara K. Shapho
12		Attorney for Plaintiff Jill Rogers
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		8 COMPLAINT FOR DAMAGES

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Dean D. Pregerson and the assigned discovery Magistrate Judge is Suzanne H. Segal.

The case number on all documents filed with the Court should read as follows:

CV10- 4518 DDP (SSx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

[X] Western Division 312 N. Spring St., Rm. G-8 Los Angeles, CA 90012

Southern Division [] 411 West Fourth St., Rm. 1-053 Santa Ana, CA 92701-4516

[] Eastern Division 3470 Twelfth St., Rm. 134 Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Lara R. Shapiro 4145 Via Marina #324 Marina del Rey, CA 90292 Telephone: (310) 577-0870 Facsimile: (424) 228-5351

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

CASE NUMBER

DDP

Jill Rogers,		CASE NOMBER	
V.	PLAINTIFF(S)	CV10	4518
USCB, Inc.; and DOES 1-10, inclusive,			
			SUMMONS
	DEFENDANT(S).		
		,	

TO: DEFENDANT(S): USCB, Inc.

A lawsuit has been filed against you.

Within ______ days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached 🗹 complaint 🗆 ______ amended complaint \Box counterclaim \Box cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Lara Shapiro ______, whose address is <u>4145 Via Marina #324, Marina del Rey, CA 90292</u> _______. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

1	JUN 182010	By:	CHRISTOPHER	POWERS
Dated:			Deputy Clerk	SEAL
			(Seal of the Court)	

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

Case 2:10-cv-04518-DDP-SS Document 1 Filed 06/18/10 Page 11 of 12 Page ID #:11 UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? If No Ves If yes, list case number(s):

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? If No Yes If yes, list case number(s):

Civil cases are deemed related if a previously filed case and the present case:

B. Call for determination of the same or substantially related or similar questions of law and fact; or

C. For other reasons would entail substantial duplication of labor if heard by different judges; or

D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
 □ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Sacramento	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Los Angeles

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose. Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Sacramento	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties Note: In land condemnation cases, use the location of the tract of land involved

37	CLONING OF A TODATES	/s/ Lara	Shapiro
x	SIGNATURE OF ATTORNEY		Quicipino

Date 06/18/2010

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

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UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA CIVIL COVER SHEET

I 10.5. Government Nota Parky) Government Nota Parky) Citizen of This State I I Incorporated or Principal Place I I I I Incorporated or Principal Place I I I I Incorporated or Principal Place I	I (a) PLAINTIFFS (Check box : Jill Rogers,		DEFENDANTS USCB, Inc.; and DOES 1-10, inclusive,				
(Place an X in one box for plaintiff and one for defendant.) (Place an X in one box for plaintiff and one for defendant.) (Place an X in one box for plaintiff and one for defendant.) (Place an X in one box only.) (ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Place an X in one box only.) (I) ORIGIN (Cite the U.S. Civil Statue under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) I) SU.S. C. 1692. Violations of the Fair Dbt Collection Practices Act (II) ORIGIN (Place an X in one box only.) (II) ORIGIN (Cite the U.S. Civil Statue under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) I) SU.S. C. 1692. Violations of the Fair Dbt Collection Practices Act (III) Antrahere	yourself, provide same.) Lara Shapiro, 4145 Via Mar	rina #324, Marina del Rey, CA 90292 3	105770870	Attorneys (If Known)			
□ 1 U.S. Government Plaintiff Ø 3 Federal Question (U.S. Government Not a Party) Citizen of This State □ 1<	II. BASIS OF JURISDICTION	(Place an X in one box only.)	III. CITIZEN (Place an)	SHIP OF PRINCIPAL P. X in one box for plaintiff a	ARTIES - F	For Diversity Cases Only efendant.)	
2 0.5. Government Detendant - Diversity (inneate characterization of Parties in Item III) - Of Business in Another State of Parties in Item III) - Of Parties in Item III) - Of Business in Another State itizet or Subject of a Foreign Country 3 3 Foreign Nation - Of Business in Another State itizet or Subject of a Foreign Country 3 3 Foreign Nation - Of Business in Another State itizet or Subject of a Foreign Country 3 3 Foreign Nation - Of Business in Another State itizet or Subject of a Foreign Country 3 - Of Business in Another State - Of Business in Another State itizet or Subject of a Foreign Country - Of Business in Another State - Of Business in Another State itizet or Subject of a Foreign Country - Of Business in Another State - Of Business in Another State VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) - Otol	🗆 1 U.S. Government Plaintiff				PTF DEF	$\begin{array}{llllllllllllllllllllllllllllllllllll$	
IV. ORIGIN (Place an X in one box only.) IV. ORIGIN (Place an X in one box only.) IV. ORIGIN (Place an X in one box only.) IV. Original proceeding 2 Removed from Appellate Court Appellat	□ 2 U.S. Government Defendant					of Business in Another State	
Image: State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify): 6 Multi- District Litigation 7 Appella to Dist Judge from Magistrate Judy V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.) CLASS ACTION under F.R.C.P. 23: Yes No MONEY DEMANDED IN COMPLAINT: \$ 25,000.00 VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) 15 U.S.C. 1692 - Violations of the Fair Debt Collection Practices Act VI. NATURE OF SUIT (Place an X in one box only.) CONTRACT PERSONAL INURY PERSONAL INURY PERSONAL PERSONAL INURY PENSONER PERSONAL INURY 10 Motions to Vacate Science 10 Fair Labor Standa Act 440 Antitrust 120 Marine 310 Airplane 370 Other Fraud Slander 530 General Property Damage 530 General S30 Other Personal S30 Other Personal Disclosure Act 730 Labor/Mgmt. Reporting & Disclosure Act 440 Raikey Libék (M480 Consumer Credit 440 Selective Service 151 Medicare Act 340 Marine Disclosure Act 350 Civil Rights 790 Other Labolity Disclosure Act 440 Selective Service 153 Recovery of Draganizations 151 Medicare Act 340 Marine Disclosure Act 158 Disolecure Act 158 Disolecure A			Citizen or Subj	ect of a Foreign Country		Foreign Nation $\Box 6 \Box 6$	
CLASS ACTION under F.R.C.P. 23: Use Mo MONEY DEMANDED IN COMPLAINT: \$ <u>25,000.00</u> VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) 15 U.S.C. 1692 - Violations of the Fair Debt Collection Practices Act VII. NATURE OF SUIT (Place an X in one box only.) OTHER STATUTES CONTRACT PERSONAL INURY PERSONAL PERSONAL PERSONAL NURY PERSONAL PETITIONS 110 Fair Labor Standa 440 State Reapportionment 110 Insurance 310 Airplane PERSONAL INURY PERSONAL NURY PERSONAL NURY PERSONAL PERSONAL PERSONAL Vacate Sentence 720 Labor/Mgmt. 440 Banking 130 Miller Act 3310 Airplane 330 Other Personal 350 General 730 Labor/Mgmt. 440 Deportation Overpayment & 330 Fed. Employers' Iability 330 Fed. Employers' 355 Property Damage 550 Civil Rights 790 Other Labor 1/142 Approxtate 440 Costener Credit 151 Medicare Act 355 Motor Vehicle 922.42 Withdrawal 28 FORFETURE/ Security Act Stocovery of <th cols<="" td=""><td>∎ 1 Original □ 2 Removed</td><td>l from □3 Remanded from □4 Re urt Appellate Court Re</td><td></td><td>5 Transferred from anothe</td><td>r district (spa</td><td>District Judge from</td></th>	<td>∎ 1 Original □ 2 Removed</td> <td>l from □3 Remanded from □4 Re urt Appellate Court Re</td> <td></td> <td>5 Transferred from anothe</td> <td>r district (spa</td> <td>District Judge from</td>	∎ 1 Original □ 2 Removed	l from □3 Remanded from □4 Re urt Appellate Court Re		5 Transferred from anothe	r district (spa	District Judge from
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VII. NATURE OF SUIT (Place an X in one box only.) OTHER STATUTES CONTRACT TORTS PERSONAL INJURY PERSONAL PETITIONS 710 Fair Labor Standa 440 Antirust 120 Marine 920 315 Airplane 920 921 510 Motions to Act Act 430 Banks and Banking 130 Miller Act 315 Airplane 920 920 Assault, Libel & Slander 370 Other Fraud Habeas Corpus Relations 440 Deportation Overpayment & Enforcement of Judgment 151 Medicare Act 330 Fed. Employers' 385 Property Damage 550 Giver Prisonal 740 Railway Labor Act 440 Consumer Credit 152 Recovery of Defaulted 345 Marine 930 Motor Vehicle 930 Motor Vehicle 942 Appeal 28 USC 0555 Forstor Condition 1513 Reporting & Disclosure Act 440 Caster Fraide 152 Recovery of Defaulted Stander 950 Civil Rights 790 Other Labor 810 Selective Service				ite a brief statement of cau	se. Do not ci	ite jurisdictional statutes unless diversity.)	
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□ 892 Economic Stabilization Act Liability Product Liability □ 444 Welfare 881 □ 862 Black Lung (923) □ 893 Environmental Matters □ 196 Franchise □ 368 Asbestos Personal □ 445 American with □ 630 Liquor Laws □ 863 DIWC/DIWW □ 894 Energy Allocation Act □ 210 Land Condemnation Liability □ 445 American with □ 640 R.R. & Truck (405(g)) □ 895 Freedom of Info. Act □ 220 Foreclosure □ 104/20 FeeDetermination □ 442 American with □ 660 Occupational □ 865 RSI (405(g)) □ 900 Appeal of Fee Determination □ 240 Torts to Land Application Other □ 690 Other □ 870 Taxes (U.S. Plaint or Defendant) □ 443 Habeas Corpus- □ 440 Other Civil □ 690 Other □ 870 Taxes (U.S. Plaint or Defendant)	400 State Reapportionment ↓410 Antitrust ↓430 Banks and Banking ↓430 Banks and Banking ↓430 Banks and Banking ↓450 Commerce/ICC Rates/etc. □ ↓460 Deportation ↓470 Racketeer Influenced and Corrupt Organizations ∪480 Consumer Credit ↓480 Consumer Credit ↓490 Cable/Sat TV □810 Selective Service □850 Securities/Commodities/ □Exchange □ □875 Customer Challenge 12 USC 3410 □ □891 Agricultural Act □892 Economic Stabilization Act □ □930 Appeal of Fee Determi- □ation Under Equal Access to Justice □950 Constitutionality of □	□ 110 Insurance □ PEF □ 120 Marine □ 310 □ 130 Miller Act □ 315 □ 140 Negotiable Instrument □ 320 □ 150 Recovery of □ 320 ○ Verpayment & □ 330 □ Judgment □ 340 □ 151 Medicare Act □ 345 □ 152 Recovery of Defaulted □ 345 □ 153 Recovery of Defaulted □ 355 □ 153 Recovery of □ 360 ∨eteran's Benefits □ 362 □ 190 Other Contract □ 365 □ 190 Other Contract □ 365 □ 190 Franchise □ 368 REAL PROPERTY □ 368 □ 368 □ 210 Land Condemnation □ 20 □ 220 Foreclosure □ 10 □ 230 Rent Lease & Ejectment □ 462 □ 240 Torts to Land □ 463 □ 240 All Other Real Property □ 463	Airplane Airplane Produ Liability Assault, Libel & Slander Fed. Employers Liability Marine Marine Product Liability Motor Vehicle Motor Vehicle Motor Vehicle Product Liabilit Other Personal Injury Product Liabilit Personal Injury Product Liabilit Asbestos Person Injury Product Liability MMIGRATION Naturalization Application Habeas Corpus- Alien Detainee Other Immigrat	 PERSONAL PROPERTY 370 Other Fraud 371 Truth in Lend 380 Other Person Property Dan 385 Property Dan BANKRUPTCY 422 Appeal 28 US 158 423 Withdrawal 2 USC 157 441 Voting 442 Employment 443 Housing/Acco mmodations 444 Welfare al 445 American with Disabilities - Employment 446 American with Disabilities - Other 440 Other Civil Rights 	ling al □ 530 nage □ 535 nage □ 540 lity □ 555 8 □ 610 □ 620 0- h □ 630 □ 660	PETITIONS□ 710Fair Labor StandardsMotions toActVacate Sentence□ 720Labor/Mgmt.Habeas CorpusRelationsGeneral□ 730Labor/Mgmt.Death PenaltyReporting &Mandamus/Disclosure ActOther□ 740Railway Labor ActCivil Rights□ 790Other LaborPrison Condition□ 791Empl. Ret. Inc.SPENALTY□ 820CopyrightsDrug□ 820CopyrightsDrug RelatedSOCIAL SECURITYSeizure ofSOCIAL SECURITYProperty 21 USC□ 861B81□ 862Airline Regs□ 864Occupational□ 865Safety /Health□ 765Other□ 870Taxes (U.S. Plaintiff or Defendant)□ 710Faxes (U.S. Plaintiff or Defendant)	

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AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.